



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Alec Poitevint, Treasurer
Republican National Committee - RNC
310 First Street SE
Washington, DC 20003

MAR 15 2000

Identification Number: C00003418

Reference: December Monthly Report (11/1/99-11/30/99)

Dear Mr. Poitevint:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please clarify all expenditures made for Ad Cost on Schedule B for Line 21(b). If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B, E or F supporting Line 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Your report discloses in-kind contributions ("donations") from corporations on Schedule H4, supporting Line 21(a) of the Detailed Summary Page. Pursuant to Advisory Opinion 1992-33, the Commission concluded that a "national party committee may accept corporate in-kind donations in connection with fundraising activities" as long as "federal share of the goods or services is paid or transferred to the non-federal account in advance" of the acceptance of the corporate donations by the federal account.

Advisory Opinion 1992-33 also discloses a detailed method for reporting the receipt of corporate in-kind donations on the committee's I Schedules as follows:

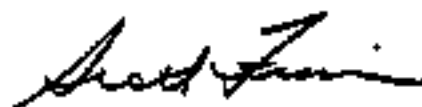
The full amount of the in-kind contributions received by the non-federal account should be disclosed on Schedule I with a supporting memo Schedule A that itemizes each contributor's identification. 11 CFR 104.8(e)

In addition, in order to reflect the fact that the reported in-kind donations have been expended in the same period as received by the committee, the total amount of the in-kind contributions should be entered on Line 5 of the Schedule I as an other disbursement with a notation reference to the memo Schedule A filed for Line 1. Alternatively, the committee may include the total amount of the in-kind contributions to the non-federal account on Line 1 and then make a cross reference to the entries on Schedule H4 to which the total amount relates. This reference should specify particular pages of the Schedule H4 where the in-kind donors are identified.

Please amend your I Schedules to disclose non-federal in-kind contributions in accordance with Advisory Opinion 1992-33.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Scott Francis
Reports Analyst
Reports Analysis Division

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